

From: Gwenn Godek
Sent: Christopher Calfee
To: Smith, Eimon; Paek, Edward
Subject: Proposed CEQA Guideline Amendments

Dear Mr. Calfee

The Los Angeles Unified School District has some minor recommendations for the Proposed CEQA Guideline Amendments that we would like to submit for your consideration. We recognize that comments on were due on October 12 and understand if it is too late to include these in the record, but wanted to send them along just in case.

Appendix G

2. Biological Resources: Combine questions (b) and (c) to read as follows: "Have a substantial adverse effect on any riparian habitat, **state or federally protected wetlands** or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service **through direct removal, filling, hydrological interruption, or other means?**"
3. Biological Resources: Combine questions (e) and (f) to read as follows: "Conflict with any local policies, ordinances, **or policies** protecting biological resources, such as a tree preservation policy or ordinance, **an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**"
4. Energy: Remove or re-word the following proposed question as it does not appear fit the intent of Appendix G to help identify project features that might result in ***adverse impacts*** on the environment. The proposed questions currently reads as follows: "*Incorporate renewable energy or energy efficiency measures into building design, equipment use, transportation or other project features?*"

Categorical Exemption

1. Increase the project amount of the Section 15330 (Class 30) exemption from "\$1 million or less" to "\$2 million or less", in order to match the recent update in triggers for site assessments to require RAPs. Specifically, "Class 30 consists of any minor cleanup actions taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which are small or medium removal actions costing **\$2 million** or less.

Thank you for soliciting input from agencies such as LAUSD and allowing us to participate as you go through the process of updating the Guidelines. If we can provide any clarifications or additional feedback, please just let us know. Thank you!